UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.NJ. LBR 9004-1(b)

Eleanor M. Roman (New Jersey Bar No. 325732021)

Donald H. Cram

SEVERSON & WERSON

A Professional Corporation

595 Market Street, Suite 2600

San Francisco, CA 94105

Telephone: (415) 398-3344 Facsimile: (415) 956-0439 E-mail: emr@severson.com

E-mail: dhc@severson.com

Attorneys for SCRATCH SERVICES LLC

In Re:

BLOCKFI INC., et al.,¹

Debtors.

Chapter 11

Case No. 22-19361-MBK

(Jointly Administered)

Judge: Hon. Michael B. Kaplan, Chief

Judge

<u>APPLICATION FOR ORDER FOR ADMISSION OF DONALD H. CRAM, III</u> <u>PRO HAC VICE</u>

In accordance with Fed. R. Civ. Proc. 78, Local Civ. Rule 101 (c) and D.N.J. LBR 9010-1 governing the admission *pro hac vice* of attorneys to practice before the United States Bankruptcy Court for the District of New Jersey, interested party, SCRATCH SERVICES LLC, by and through its undersigned counsel, Eleanor M. Roman, Esq, Severson & Werson, a P.C., having entered an

¹ The Debtors in these Chapter 11 cases are: BlockFi Inc.; BlockFi Trading LLC; BlockFi Lending LLC; BlockFi Wallet LLC; BlockFi Ventures LLC; BlockFi International Ltd.; BlockFi Investment Products LLC; BlockFi Services, Inc.; and BlockFi Lending II LLC.

appearance in this case on December 19, 2022 [*Dkt. No. 118*] respectfully submits this application and moves the Court for the admission *pro hac vice* of Donald H. Cram, III, Esq. of the law firm of Severson & Werson, a P.C., 595 Market Street, Suite 2600, San Francisco, CA 94105; Telephone: (415) 398-3344, for purposes of appearance as co-counsel on behalf of interested party, SCRATCH SERVICES LLC in the above-styled case only, for all purposes relating to the proceedings pursuant to the attached Certification of Donald H. Cram, III.

- 1. Donald H. Cram, III of the law firm of SEVERSON & WERSON, a P.C., has been retained by interested party, SCRATCH SERVICES LLC to serve as counsel in these proceedings. Because of his familiarity with the facts and circumstances pertaining to SCRATCH SERVICES LLC relevant to these proceedings, SCRATCH SERVICES LLC requests that Mr. Cram be allowed to appear *pro hac vice*.
- 2. As set forth in the Certification of Donald H. Cram, III attached hereto, Mr. Cram is a member in good standing of the bar of the State of California and of the State of Texas. Mr. Cram is not under suspension or disbarment by any court.
- 3. If admitted *pro hac vice*, Mr. Cram has represented that he will adhere to the disciplinary jurisdiction of this Court.

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WHEREFORE, it is respectfully requested that the Court grant the SCRATCH SERVICES LLC'S Application pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit Donald H. Cram, III *pro hac vice* in the above captioned matter.

Respectfully submitted,

DATED: December 28, 2022

By: /s/ Eleanor M. Roman
ELEANOR M. ROMAN

SEVERSON & WERSON, a Professional Corporation Eleanor M. Roman (New Jersey Bar No. 325732021) 595 Market Street, Suite 2600 San Francisco, CA 94105 Telephone: (415) 398-3344 Facsimile: (415) 956-0439

Attorneys for SCRATCH SERVICES LLC

E-mail: emr@severson.com

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